UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE TURQUOISE HILL RESOURCES LTD. SECURITIES LITIGATION

Case No. 1:20-cy-08585-LJL

ORDER GRANTING JOINT MOTION FOR ISSUANCE OF A LETTER OF REQUEST PURSUANT TO THE HAGUE CONVENTION ON THE TAKING OF EVIDENCE ABROAD IN CIVIL OR COMMERCIAL MATTERS DATED MARCH 18, 1970

The Court, having reviewed the joint Motion for Issuance of A Letter of Request Pursuant to the Hague Convention on the Taking of Evidence Abroad in Civil or Commercial Matters Dated

March 18, 1970, as well as papers in support, HEREBY ORDERS THAT:

- 1. The Motion is GRANTED.
- 2. The Request for Judicial Assistance Pursuant to the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters attached as Exhibit A to the Declaration of Corey Worcester, dated April 20, 2023, is hereby issued as the Court's "Letter of Request" and is fully incorporated herein.
- 3. The signed Order and the Letter of Request will be given to Quinn Emanuel Urquhart & Sullivan, who will cause both documents to be filed with the Registry of the Supreme Court of New South Wales
- 4. The protective order governing confidentiality in this action shall apply to Grant Brinkmann's deposition, including the transcript and video, and to documents produced by Mr. Brinkmann.
- 5. This Order, Grant Brinkmann's production of documents, the deposition of Grant Brinkmann, or the terms of the Letter of Request (which are incorporated into this Order) shall not

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be construed or operate as a waiver of any argument, position, objection, allegation, or claim or defense of any party in the above-captioned action, or of the attorney-client privilege, the work product doctrine, or any other privileges, rights, protections, or prohibitions that may apply to that evidence under the laws of Australia, the United States of America, or the State of New York.

IT IS SO ORDERED.

DATED:

4/21/2023

THE HONORABLE LEWIS J. LIMAN UNITED STATES DISTRICT JUDGE